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ASARCO

GLOBE PLANT

February 24, 1999

Via facsimile

Bonnie Lavelle
USEPA, Region VIII
999 18th Street, #500
Denver, CO 80202-2405

Re: Comments on EPA's Draft Conceptual Site Model and Draft Problem
Definition and Risk Management Objectives for the Vasquez Blvd./I-70 Site

Dear Bonnie:

This letter responds to your request at the February 18 workgroup meeting for comments on the draft conceptual site model and risk management objectives for the Vasquez Boulevard/I-70 site. Asarco appreciates the opportunity to provide input on the early stages of the risk assessment and remedial investigation process for the site, and our comments reflect the preliminary nature of the documents. Our comments are listed below by document.

Conceptual Site Model

In general, the draft conceptual site model is a good representation of the potential exposure pathways at the site and will be useful in organizing discussions about the risk assessment. It would be helpful if the agency would clarify the following issues.

- The significance of the dashed line from "Other" under Contaminant Source should be noted on the figure of the Conceptual Site Model. What does the dashed line mean in relation to the question mark in the "Other" box?
- The groundwater, surface water, and sediment pathways should have question marks at this point if, as stated at the meeting, the investigation of these media has not been completed. The chart should indicate that it is not known at this time whether these pathways are complete. However, we note that the Review Cover Sheet for the HRS Documentation Record for the site states that individuals inhabiting an area within four miles of the VB/I70 study area "receive most of their drinking water from municipal sources and not from localized groundwater aquifers". It also states with

respect to the South Platte River that there were "no identified drinking water intakes along the 15-mile target distance limit". We recognize and agree with EPA's decision to make the soil exposure pathway a priority, but it seems that the issue of drinking water supplies might be clarified relatively easily and should be done at this point.

- Commercial workers may also be exposed to dust indoors. Thus, for this exposure medium the potential for worker exposure should be indicated using the same symbols shown for residents.
- Where the Conceptual Site Model refers to outdoor air, the word "outdoor" should be deleted because inhalation exposures may occur both indoors and outdoors.

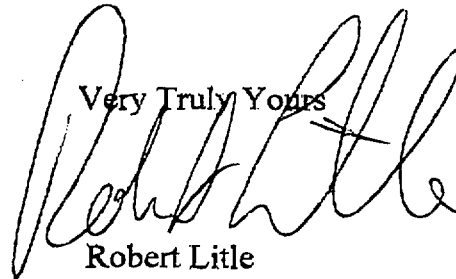
Problem Definition and Risk Management Objectives

At this point, because this document has already undergone one revision, our comments are few. In addition we understand that one of the purposes of this document is to collect the concerns of the parties involved.

- Under "Problem Definition", the problem of potential concern at the site is stated to be contamination of environmental media with chemicals associated with current and former activities at three smelters. This statement is not consistent with the sources listed on the Conceptual Site Model. Some mention should be made that the sources of contamination are still being investigated.
- The risk assessment for the site must be consistent with the National Contingency Plan and within EPA's statutory authority in order to be the basis for further response actions. Under "Human Health Risk Assessment Objectives", some of the tasks appear to be beyond the scope of the NCP and it is unclear whether all the stated objectives will be addressed by the risk assessment. For example, the collection of epidemiological data is noted to be the responsibility of ATSDR. Please clarify if this will be a separate report or will be part of the risk assessment. The identification of individuals for health intervention may also be the responsibility of ATSDR. Similarly, investigations and risk assessments prior to changes in zoning or permitting new industry may be the responsibility of the State of Colorado rather than that of EPA under CERCLA.
- Under "Ecological Risk Assessment Objectives", an objective to determine the presence or absence of sensitive ecological systems should be added. Also, it would be more user-friendly to come up with a more understandable term for "riparian systems."

Please call me at (303) 296-5115 or Joyce Tsuji at (425) 643-9803 if you have any questions about Asarco's comments.

Very Truly Yours

A handwritten signature in black ink, appearing to read "Robert Litle", written over the typed name.

Robert Litle

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